

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GORDON HEMPTON,

Plaintiff,

v.

POND5, INC., A DELAWARE
CORPORATION; AND POND5 USER
CKENNEDY342, A CORPORATION OR
INDIVIDUAL OF TYPE UNKNOWN,

Defendants.

No.: 3:15-cv-05696-L

**DECLARATION OF CURT H. FEIG
IN SUPPORT OF POND5, INC.'S
OPPOSITION TO PLAINTIFF'S
MOTION FOR RECONSIDERATION
[DKT. 51]**

I, Curt H. Feig, declare and state as follows:

I am over the age of 18 and am competent to testify to the matters set forth herein. I am one of the attorneys representing defendant Pond5, Inc. ("Pond5"). I submit this Declaration in Support of Pond5's Oppositions to Plaintiff's Motion for Reconsideration [Dkt. 51].

1. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Pond5 dated March 22, 2016.

2. Attached hereto as **Exhibit 2** is a true and correct copy of an e-mail from Jeanette Hendricks to Jamie Telegin, et al., dated April 28, 2016.

3. Attached hereto as **Exhibit 3** is a true and correct copy of an e-mail from Roger Townsend to Larry Altenbrun dated July 14, 2016. Certain information related to settlement has been redacted.

DECLARATION OF CURT H. FEIG IN SUPPORT OF
DEFENDANT POND5 INC.'S OPPOSITION TO PLAINTIFF'S
MOTION FOR RECONSIDERATION [DKT. 51] - 1
(3:15-cv-05696 BJR)

LAW OFFICES OF
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1 4. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the
2 30(b)(6) Deposition of Pond5 taken August 16, 2016.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct, and that this Declaration was executed on November 22, 2016, at Seattle,
5 Washington.

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7 /s/ Curt H. Feig
8 Curt H. Feig, WSBA #19890
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CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/CF system which will send notification of such filing to the following:

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DATED this 22nd day of November, 2016.

/s/ Curt H. Feig
Curt H. Feig, WSBA #19890